

18. WILDFIRE

18.1 INTRODUCTION

The Wildfire chapter of the EIR summarizes the setting information and identifies wildfire potential within the project area based on State and local mapping. The chapter also includes a review of completed, active, and planned fuel treatments projects within the region and consideration of site-specific factors that could affect wildfire potential at the project site.

18.2 EXISTING ENVIRONMENTAL SETTING

The following section describes the existing wildfire setting in the project region, including the existing fire types, wildland fire hazards, fuel treatment efforts, public safety power shutoffs, and fire protection agencies and resources in the project region.

Fire Types

The following sections describe the three fire types to which various areas of Placer County are at risk of experiencing.

Wildfires

Wildfires occur on mountains, hillsides, and grasslands. Vegetation, wind, temperature, humidity, and slope are all factors that affect how wildfires spread. In Placer County, native vegetation, such as chaparral, sage, and grassland, provide fuel that allows wildfires to spread easily across large tracts of land. Such plant species are capable of regeneration after a fire, making periodic wildfires a natural part of the local ecology. Placer County is considered a rural/suburban County with wildfire as the most prevalent fire type. The climate of the Placer County region keeps the grass dry, which makes the region's grass more readily combustible during fire season. As discussed in further detail in the Topography and Vegetation subsection, steep slopes bring grass and brush within reach of upward-moving flames, while impeding the access of firefighting equipment. Seasonal drought conditions exacerbate fire hazards.

Wildland-Urban Interface Fires

The wildland-urban interface (WUI) zone is an area where buildings and infrastructure (e.g., cell towers, schools, water supply facilities) mix with areas of wildland vegetation susceptible to ignition due to several factors, including topographical features, vegetation fuel types, local weather conditions, and prevailing winds. The interface is sometimes divided into the defense zone (areas near communities, usually about 0.25-mile thick) and threat zones (an approximately 1.25-mile buffer around the defense zone). Wildfires and urban interface fires have occurred within Placer County, especially in the Sierra Nevada region where a majority of parcels are within a Very High Fire Hazard Severity Zone (FHSZ).

In the WUI zone, efforts to prevent ignitions and limit wildfire losses hinge on hardening structures and creating defensible space through a multi-faceted approach, including engineering, enforcement, education, emergency response, and economic incentive. Different strategies in the defense and threat zones of the WUI help to limit the spread of fire and reduce risks to people and property. As discussed in further detail in the Wildfire Classifications subsection, wildfire



threat within the County ranges from Moderate to Very High. The highest threat occurs in the Sierra Nevada, which is considered a Very High FHSZ, whereas the County's valley and foothill regions are considered Moderate and High FHSZs.

Structural Fires

Urban fires occur in developed environments, destroying buildings and other humanmade structures. Structural fires are often caused by faulty wiring or mechanical equipment or combustible construction materials, and are able to proliferate due to the absence of fire alarms and sprinkler systems. The fires have been due largely to human accidents, although deliberate fires (arson) may be a cause of some events. Older buildings that lack modern fire safety features may face greater risk of damage from fires. To minimize fire damage and loss, the County's Fire Code, based on the California Fire Code (CFC), sets standards for building and construction. It requires the provision of adequate water supply for firefighting, fire retardant construction, and minimum street widths, among other things. Fire prevention awareness programs and fire drills are conducted to train residents to respond quickly and correctly to reduce injury and losses during fires.

Wildland Fire Hazards

The following section includes a discussion of the potential for wildland fires to occur in the project area and the agencies and resources available for wildland fire suppression.

Wildfire Classifications

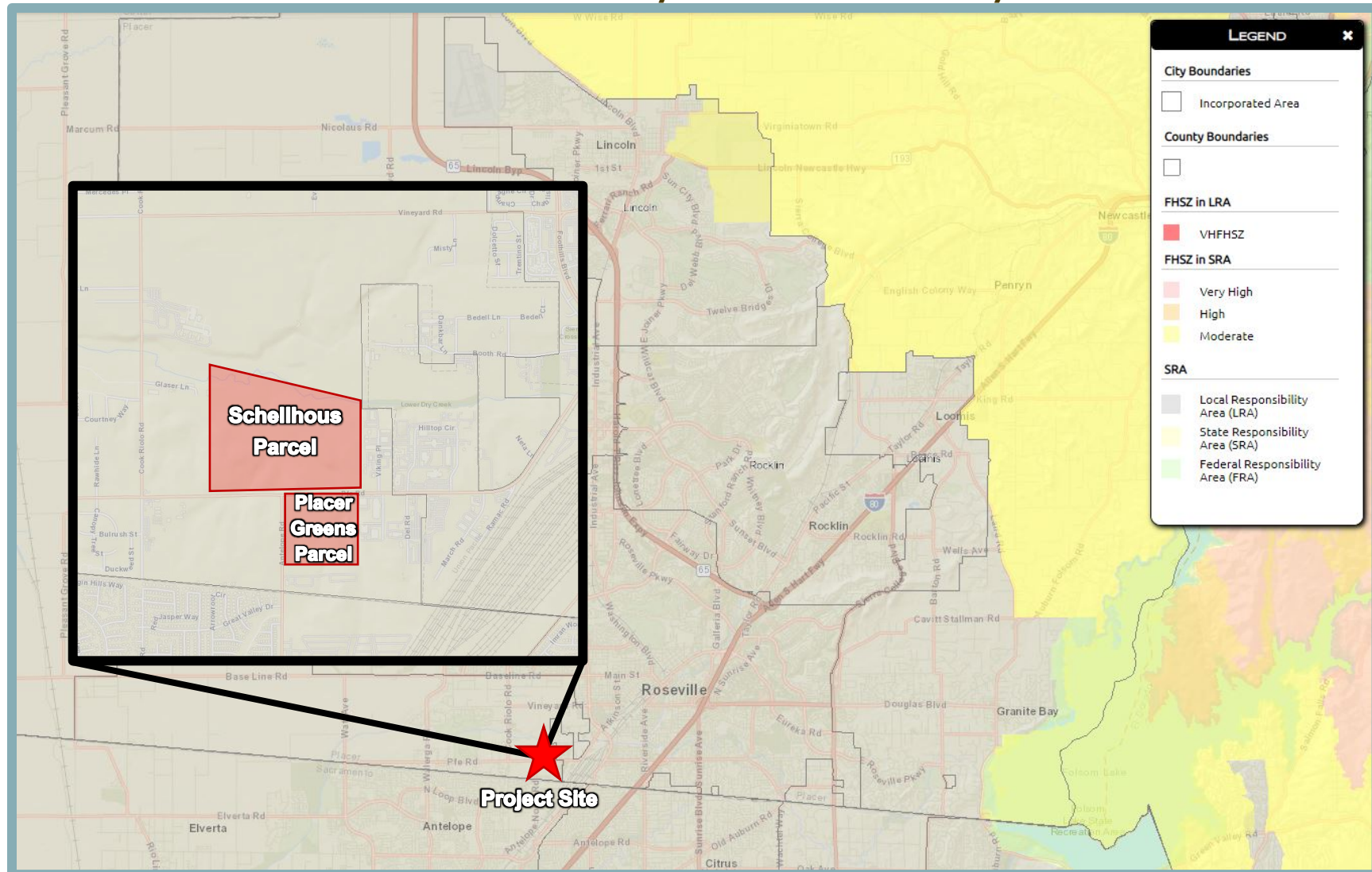
With respect to wildland fires, previous significant WUI fires within the State have precipitated the passage of statutes necessitating the classification of wildland fire hazard areas, according to a location's potential for causing ignitions to buildings. Such classifications are referred to as FHSZs and provide the basis for application of various mitigation strategies to reduce risks to buildings associated with wildland fires. The zones also relate to the requirements for building codes designed to reduce the ignition potential to buildings in the WUI zones.

Pursuant to Government Code Section 51178, Very High FHSZs are determined by the Director of Forestry and Fire Protection, based on consistent statewide criteria and the severity of fire hazard that is expected to prevail in such areas. Very high FHSZs are based on fuel loading, slope, fire weather, and other relevant factors, including areas where Santa Ana, Mono, and Diablo winds have been identified by the California Department of Forestry and Fire Protection (CAL FIRE) as a major cause of wildfire spread. Public Resources Code (PRC) Sections 4201 through 4204 direct CAL FIRE to map fire hazards within State Responsibility Areas (SRAs), based on relevant factors such as fuels, terrain and weather. SRAs are recognized by the Board of Forestry and Fire Protection as areas where CAL FIRE is the primary emergency response agency responsible for fire suppression and prevention.

The project site is not located within a SRA, but, rather, is located within a Local Responsibility Area (LRA). As shown in Figure 18-1, the project site is identified by CAL FIRE as being within a Non-Very High FHSZ area. Additionally, the project site is not located within a WUI zone (see Figure 18-2).



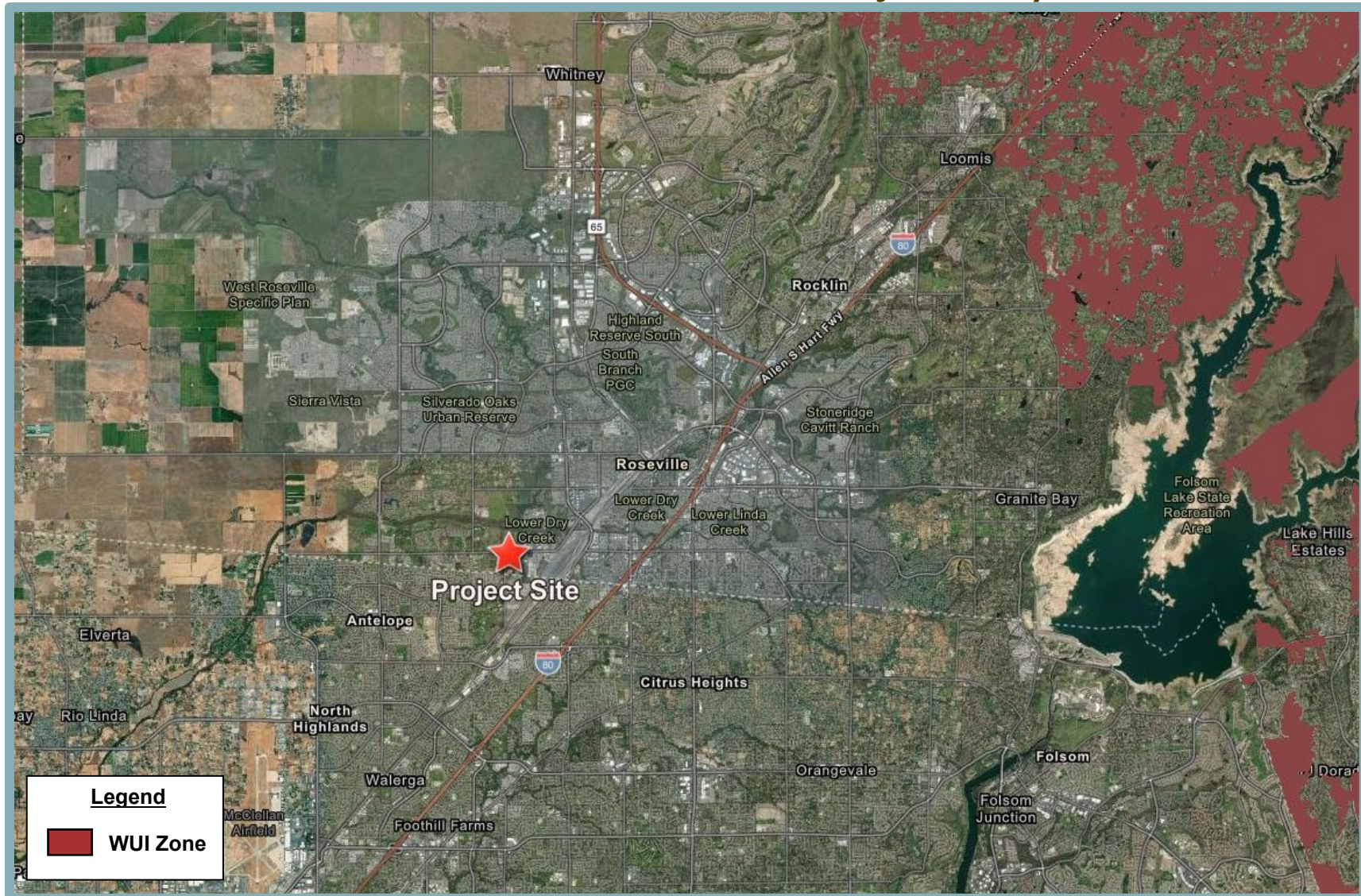
**Figure 18-1
Fire Hazard Severity Zones in Placer County**



Source: California Department of Forestry and Fire Resources, Fire Hazard Severity Zone Viewer, 2022.



Figure 18-2
Wildland-Urban Interface Zones in Project Vicinity



Topography and Vegetation

Topography, which includes slope and aspect, can play a significant role in wildfire risk. Fires burn faster uphill than downhill, due to fuels above a fire being brought into closer contact with upward moving flames. In addition, the process of heat transfer is influenced by topography, because heat rises (convection) and heat transfer through convection tends to move upward. Furthermore, during wildfires, burning materials on the forest floor also create convection currents that preheat the leaves and branches of shrubs and trees above the fire. Heat transfer, therefore, occurs more rapidly through fuels up a slope, resulting in fire traveling more quickly upslope than downslope.

Vertical air currents can also lift burning materials, as floating embers, known as firebrands, can settle in unburned areas ahead of a fire, starting smaller fires. The phenomenon is called spotting and can result in rapid advancement of a fire.

With respect to the project region's topography and vegetation, the region's elevation and topography is varied, due to the presence of upland areas and floodplains, but overall, the Dry Creek-West Placer Community Plan (DCWPCP) area does not contain steep slopes or significant slopes, such as those in steep-walled canyons or mountainous valleys. The absence of steep and significant slopes limits wildfire risks related to topography in the project region.

While the Schellhous and Placer Greens parcels are predominantly undeveloped, many portions of the DCWPCP area are currently developed with a variety of scattered single-family homes and residential subdivisions. The DCWPCP area is an urbanizing area, which encompasses approximately 9,200 acres in the southwest portion of Placer County and is comprised of multiple specific plan areas, including the Riolo Vineyard Specific Plan (RVSP) and the Placer Vineyards Specific Plan (PVSP).

The site of the County-approved Brady Vineyard Subdivision Project is approximately 0.72-mile to the northeast of the Schellhous parcel, and the project is currently under construction. The RVSP, approximately 1.7 miles to the west of the project site, is currently under construction, and the PVSP, which is approximately 2.1 miles to the west of the project site, currently has portions under construction. Additionally, the Double S Ranch Project is located southeast of the Vineyard Road/Cook Riolo Road intersection, 0.52-mile to the northwest of the project site. Completion of the aforementioned development would remove available fuel sources from the project region, primarily consisting of grassland areas.

Beyond the boundaries of the DCWPCP, other existing development is located in the project vicinity, which further reduces the available fuel sources near the project site. The City of Roseville is located to the northeast and east of the project site and includes the Dry Creek Wastewater Treatment Plant (WWTP) site, which abuts the northeast corner of the Schellhous parcel. Various industrial and public/quasi-public uses are located to the east, and to the south of the Placer Greens parcel are Roseville Storage, an industrial truck storage facility, New America Express Truck & Trailer Repair, a semi-trailer truck service and repair business, and Copart, an auto auction company. The Placer Greens parcel is also located approximately 420 feet north of the boundary separating Placer County (to the north) and Sacramento County (to the south). Several single-family residential subdivisions are located immediately south of the county boundary line, including the East Antelope Legends, Carriage Oaks, Highland Hill, Antelope Meadows, Antelope Village, and Antelope Oaks neighborhoods, all of which are connected by way of various neighborhood streets.



With respect to the project site, the Schellhous parcel is predominantly undeveloped and the Placer Greens parcel is devoid of existing structures. Both parcels are comprised of undeveloped annual grassland, swales and streams associated with Dry Creek and its tributaries, riparian woodland vegetation, and trees that line the frontages of PFE Road and Antelope Road, which are adjacent to the project site. The existing vegetation within both parcels provides potential fuel for wildfire.

The northern portion of the Schellhous parcel consists of a segment of Dry Creek and the creek's riparian woodland corridor. Given the gently rolling terrain across the project site, slope would not affect on-site fire behavior, as compared to mountainous areas associated with the Sierra Nevada in the County's northeastern region.

In addition, areas to the north and west of the project site are comprised predominantly of scattered single-family residences and grassland/agricultural land, which provide potential fuel sources for wildfire.

Prevailing Winds

The predominant wind direction at the project site is from the south throughout the year.¹ Southerly winds are most dominant from mid-February to November. In addition, winds also occur from the west during the summer months. The southerly direction of prevailing winds suggests that, during the majority of the year, winds would generally facilitate the spread of fire towards the north of the project site, where the Dry Creek corridor is located. Additionally, a fire burning to the west of the project site could potentially move towards the project site.

Large Fire History

According to CAL FIRE, relatively few larger wildfires, defined as 10 acres or greater, have occurred within the region surrounding the project site over the past three years.²

- In September 2021, the Bridge Fire burned 411 acres in Placer County, along the North Fork American River and its drainages, near the Foresthill Bridge in the City of Auburn. Damages were as follows: one injury. Structures were not reported as damaged or destroyed.
- In August 2021, the River Fire burned 2,619 acres in Nevada and Placer counties, along the Bear River and its drainages, near Milk Ranch Road and Bear River Campground Road. Damages were as follows: 21 structures damaged, 142 structures destroyed, and four injuries.
- In June 2021, the Watt Fire burned 42 acres in Placer County, near the intersection of PFE Road and Watt Avenue to the west of the City of Roseville, approximately 3.2 miles west of the project site. The fire was a grassland fire, caused by non-arson human activity. Damages to structures or injuries to fire personnel and/or civilians were not reported. Most of the grassland fuel source has since been removed, due to development of structures and infrastructure, which has reduced the risk of fire hazard in the area.
- In August 2020, the Perry Fire burned nine acres in Placer County, near the intersection of Perry Ranch Road and Werner Road in the City of Auburn. Damages to structures or injuries to fire personnel and/or civilians were not reported.

¹ Weather Spark. *Climate and Average Weather Year Round in Roseville*. Available at: <https://weatherspark.com/y/1156/Average-Weather-in-Roseville-California-United-States-Year-Round>. Accessed February 2022.

² CAL FIRE. *Incidents Overview*. Available at: <https://www.fire.ca.gov/incidents/>. Accessed February 2022.



- In August 2020, the Duluth Fire burned 65 acres in Placer County, near the intersection of Duluth Avenue and Nichols Drive to the west of the City of Rocklin. Damages to structures or injuries to fire personnel and/or civilians were not reported.
- In June 2020, the Nelson Fire burned 110 acres in Placer County, near the intersection of Nelson Road and Rockwell Lane to the west of the City of Lincoln. Damages to structures or injuries to fire personnel and/or civilians were not reported.
- In June 2020, the Watt Fire burned 40 acres in Placer County, near the intersection of PFE Road and Watt Avenue to the west of the City of Roseville, approximately 3.2 miles west of the project site. The fire was a grassland fire, caused by non-arson human activity. Damages to structures or injuries to fire personnel and/or civilians were not reported. Most of the grassland fuel source has since been removed, due to development of structures and infrastructure, which has reduced the risk of fire hazard in the area.
- In June 2020, the Karchner Fire burned 39 acres in Placer County, near the intersection of Karchner Road and Riosa Road to the east of the City of Wheatland. Damages to structures or injuries to fire personnel and/or civilians were not reported.
- In June 2020, the Amoruso Fire burned 650 acres in Placer County, near the intersection of Sunset Boulevard West and Amoruso Way to the southwest of the City of Lincoln. Damages to structures or injuries to fire personnel and/or civilians were not reported.
- In November 2019, the Foothills Fire burned 355 acres in Placer County, near the intersection of Foothills Boulevard and McAnally Drive in the City of Roseville, approximately 2.1 miles northeast of the project site. Damages to structures or injuries to fire personnel and/or civilians were not reported.
- In September 2019, the Baseline Fire burned 604 acres in Placer County, near the intersection of Baseline Road and County Acres Lane to the west of the City of Roseville, approximately 5.6 miles northwest of the project site. The fire was a grassland fire, caused by non-arson human activity. Damages to structures or injuries to fire personnel and/or civilians were not reported. Most of the grassland fuel source has since been removed, due to development of structures and infrastructure, which has reduced the risk of fire hazard in the area.
- In June 2019, the Dyer Fire burned 148 acres in Placer County, near the intersection of Watt Avenue and Dyer Lane to the west of the City of Roseville, approximately 3.3 miles west of the project site. The fire was a grassland fire, caused by non-arson human activity. Damages to structures or injuries to fire personnel and/or civilians were not reported. Most of the grassland fuel source has since been removed, due to development of structures and infrastructure, which has reduced the risk of fire hazard in the area.
- In June 2019, the Watt Fire burned 27 acres in Placer County, near the intersection of Watt Avenue and Baseline Road to the west of the City of Roseville, approximately 3.6 miles northwest of the project site. The fire was a grassland fire, caused by non-arson human activity. Damages to structures or injuries to fire personnel and/or civilians were not reported. Most of the grassland fuel source has since been removed, due to development of structures and infrastructure, which has reduced the risk of fire hazard in the area.
- In May 2019, the Sugar Fire burned 65 acres in Placer County, near the intersection of Sugar Pine Road and Big Reservoir Road to the northeast of the community of Foresthill. Damages to structures or injuries to fire personnel and/or civilians were not reported.

CAL FIRE strives to extinguish 95 percent of all wildland fires at 10 acres or less. Additional fires, beyond those listed above, have occurred within the region surrounding the project site over the



past three years. The fires, for the most part, were extinguished within the above stated goal of under 10 acres.

Fuel Treatment Efforts

Fuel treatment efforts have been ongoing within the project region. Forest fuel treatments are used by managers for ecological restoration and reducing fire hazards. Due to past management decisions and long-term fire exclusion, forests are denser and are susceptible to severe wildfires. Fuel treatments aim to reduce the intensity and size of wildfires, increase species diversity, and restore forests to their historical condition. Two common types of treatments include:

- Mechanical thinning: cutting and clearing wood and brush; and
- Prescribed fire: burning existing fuel before more accumulates.

Based on proximity to homes and communities, one treatment may be used over the other. Several research studies show a combination of thinning, followed by burning of surface fuels, is most effective in promoting forest resilience to wildfire.³

Implementation of the Placer County Conservation Program (PCCP) would result in the permanent protection of approximately 50,000 acres in conservation reserves by the year 2060. Preservation of the protected lands require that they are managed to reduce their susceptibility to wildfire. For example, each Reserve System unit would have a fire management component that would describe site-specific conditions and actions required to (1) reduce existing fuel loads, (2) re-introduce fire as a natural process of the ecosystem (if permissible), (3) minimize environmental effects and protect sensitive resources, and (4) enhance and/or restore natural community characteristics.

Current fuel reduction efforts (i.e., the Chipper Program) and new programs (i.e., the Biomass Box Program) would accomplish fuel reduction treatment efforts. The Placer County Resource Conservation District's (RCD) Chipper Program provides low-cost brush chipping for residents in Placer County. The Chipper Program continues to be available for local residents seeking to reduce fire hazards and improve defensible space around buildings and structures. The Chipper Program is funded through grants secured through a partnership with the RCD, Placer County Office of Emergency Services (OES), the Placer County Sheriff's Office, the Placer County Air Pollution Control District, and CAL FIRE.⁴

The Placer County Wildfire Protection and Biomass Utilization Program (i.e., the Biomass Box Program) was established in 2006 to help protect residents, communities, forests, and important forest resources from the threat of wildfire and to efficiently manage and use biomass. Many wildfire protection activities and projects involve the cutting of trees and brush to reduce wildfire hazard. Trees large enough to have commercial value as lumber are transported to mills for processing, but brush, small trees, and the limbs and tops of larger trees are excess biomass that has most often been disposed of by open burning to complete the necessary reduction of fire hazard. Placer County has recognized that a better option is to use the excess biomass for generation of energy. As part of the thinning of forested areas, the excess brush, small trees,

³ For example, see U.S. Department of Agriculture/Forest Service, Rocky Mountain Research Station. *Review of Fuel Treatment Effectiveness in Forests and Rangelands and a Case Study from the 2007 Megafires in Central Idaho USA (General Technical Report RMRS-GTR-252)*. January 2011.

⁴ Placer County. *Chipper Program Available for Placer County Residents*. Available at: https://www.placer.ca.gov/483/_1122012. Accessed February 2022.



limbs, and tree tops are ground and then transported by way of haul trucks to a biomass power plant. Using excess biomass for generation of energy provides benefits through offsetting fossil fuel energy generation, reducing air pollution emissions, and increasing support for jobs associated with the biomass utilization. Use of biomass for energy also has potential to help support the economic sustainability of forest management and hazard reduction projects designed to reduce the negative effects of wildfires.⁵

Public Safety Power Shutoffs

In an effort to prevent fires, the electrical services provider for southern Placer County, Pacific Gas & Electric Co. (PG&E), initiated public safety power shutoffs (PSPS) in 2019, which may continue in subsequent years until fire risks associated with power lines are decreased. PSPS events involve PG&E turning off electrical service during times when the weather is predicted to have a heightened fire risk from gusty winds and dry conditions. Dependent on the fire risks, the power outage events may occur in specific areas or for all PG&E customers across the County.

Similarly, the Sacramento Municipal Utility District (SMUD), a community-owned electric utility that serves Sacramento County and portions of Placer County, maintains the option, if necessary, of shutting off power. SMUD has protocols for disabling automatic reclosers and for de-energizing lines to protect public safety and also has an Outage Communications Plan that addresses potential de-energization events. In the event that power must be shutoff, SMUD will include targeted messaging for affected areas that will set expectations and identify support resources.

The California Public Utilities Commission adopted the High Fire-Threat District Map in 2018,⁶ which serves to assist in the public's protection from potential fire hazards associated with overhead powerline facilities and nearby aerial communication facilities by delineating fire-threat areas in the State. Fire-threat areas are designated as Tier 1, 2, or 3, with Tier 1 defined as a High Hazard Zone, Tier 2 as an Elevated Hazard Zone, and Tier 3 as an Extreme Hazard Zone. The project site is not located within an area designated as Tier 1, 2, or 3 (see Figure 18-3).⁷ As such, the site would not be regularly subject to PSPS events. Throughout PSPS events, emergency services in Placer County remain functional with back-up power supplies, but many businesses and agencies are not operational, which can result in inadequate access to medical services and exposure to excessive heat or cold.

Fire Agencies and Resources

Several fire agencies provide fire protection services in the project region, including wildland fire and structural fire response. The Placer County Fire Department (PCFD), which has a Cooperative Fire Protection Agreement with CAL FIRE, provides wildland fire suppression at the project site. Both CAL FIRE and PCFD are discussed below.

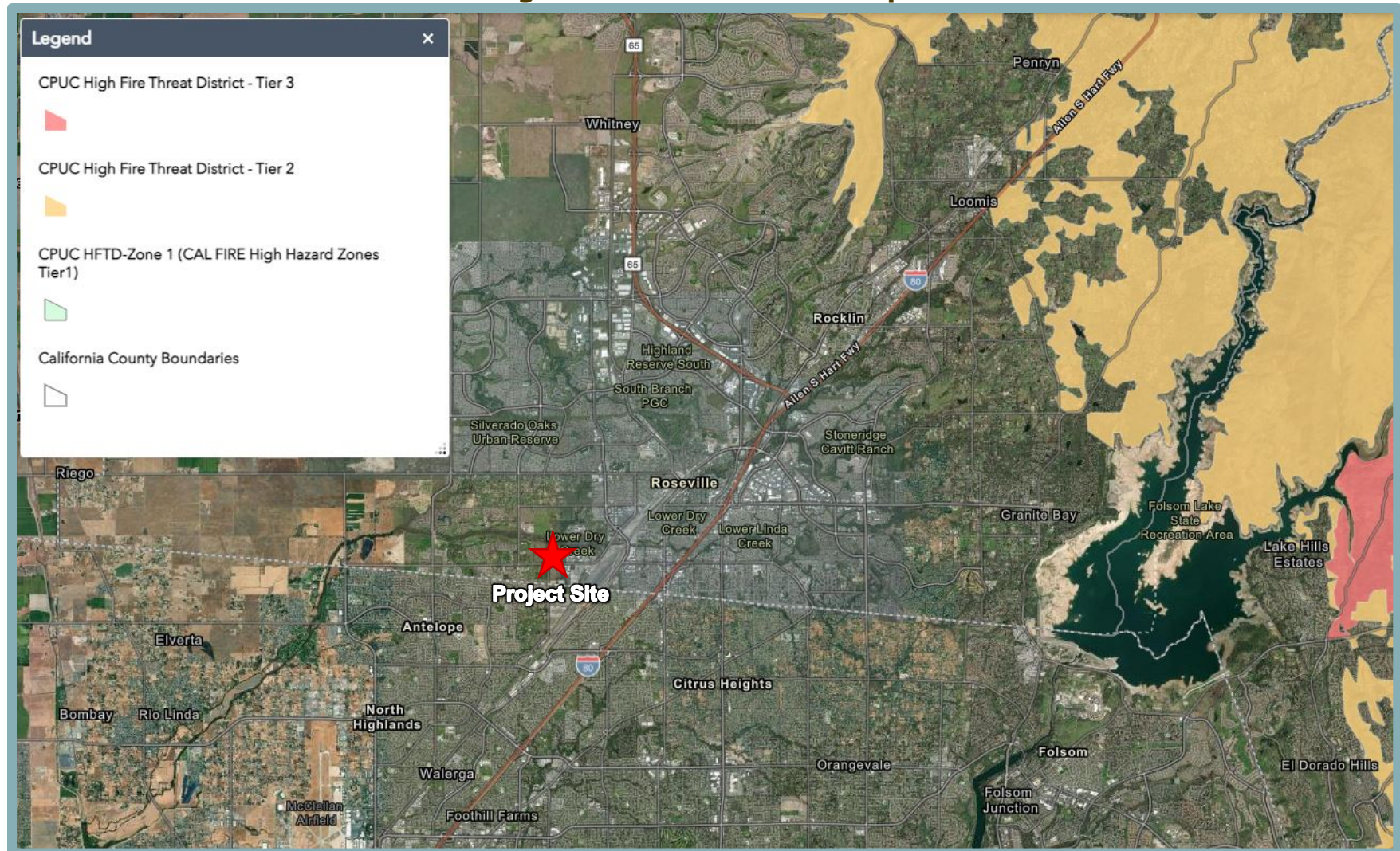
⁵ Placer County Community Development Resource Agency. *Biomass and Wildfire Protection*. Available at: <https://www.placer.ca.gov/2881/Biomass-Wildfire-Protection#:~:text=The%20Placer%20County%20Wildfire%20Protection,large%20component%20of%20that%20threat>. Accessed April 2021.

⁶ California Public Utilities Commission. *Fire-Threat Maps and Fire-Safety Regulations Proceedings*. Available at: <https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking>. Accessed February 2022.

⁷ Pioneer Community Energy. *Public Safety Power Shutoffs*. Available at: <http://pioneercommunityenergy.ca.gov/need-to-know/pssp-events/>. Accessed April 2021.



**Figure 18-3
High Fire-Threat District Map**



Source: California Public Utilities Commission, CPUC High Fire Threat District (HFTD) Map, 2022.



California Department of Forestry and Fire Protection

Wildland fire protection is provided either by the State (through CAL FIRE) or the federal government (through the U.S. Forest Service). The State has direct protection responsibility for all State and private wildlands (or forest lands) in designated areas, and provides support and assistance to local jurisdictions in other areas of the State. CAL FIRE provides support and assistance to PCFD for wildland fire response at the project site and strives to meet the National Fire Protection Association (NFPA) 1710 guideline for fire department response time of five minutes 90 percent of the time.

The nearest CAL FIRE station to the project site is Station No. 100, located at 8350 Cook Riolo Road, 0.82-mile northwest of the project site. The CAL FIRE station is jointly operated with the PCFD and provides services to the unincorporated areas of Placer County. Station 100 is a full-time staffed station. The full-time firefighters are augmented by seasonal and volunteer firefighters that support the emergency response capabilities of CAL FIRE and PCFD. CAL FIRE has mutual and/or automatic aid agreements, and, thus, may assist local fire agencies with structural fires and medical incidents under the closest resource concept. In addition, as is currently the case, incidents could occur where the City of Roseville Fire Department is called upon to provide mutual aid at or near the project area to send the closest available unit to an emergency incident, regardless of jurisdictional boundaries. In that spirit of cooperation to provide the fastest and highest level of service to the surrounding area, the Roseville Fire Department has signed onto a Closest Resource Agreement (CRA) with PCFD and other surrounding fire departments to provide mutual aid between all participating fire departments. As outlined in the CRA, Roseville can adjust the amount of reciprocal coverage by setting draw-down levels, or withdraw from the CRA entirely.

Placer County Fire Department

The project site is located within the service territory of the PCFD, whose services are administered by the County OES. The territory served by the PCFD is consistent with the boundaries of County Service Area (CSA) 28, which is used as a means to fund PCFD services. Within CSA 28, the project site is located within Zone 165, which covers approximately 19,800 acres. Zone 165 was established in September 2001, the point at which Placer County assumed responsibility for providing fire protection and emergency medical services (EMS) within the area.

As previously discussed, because the project site is located within an LRA, the PCFD is responsible for providing wildland fire suppression services to the project site. In combination with CAL FIRE, the PCFD integrates State and local firefighting resources, which includes services rendered through eight full-time stations and seven volunteer fire stations. PCFD services include fire protection, rescue, and emergency response services for approximately 475 square miles of unincorporated area in Placer County. Fire prevention and protection in areas of Placer County not served by independent fire protection districts or municipal fire departments are provided through a partnership with CAL FIRE and seven volunteer companies, all operated by CAL FIRE under the name PCFD. Services provided include fire suppression, emergency medical, fire prevention, and rescue, among others. Additionally, PCFD, by way of its contract with CAL FIRE, conducts fire inspections and assists with land development functions within the PCFD service area. All fire agencies within Placer County operate under a mutual aid system, defined as a pre-arranged plan and contract between agencies for reciprocal assistance upon request by the first-response agency.



Currently, CAL FIRE employs 69 personnel that respond to PCFD calls for service, including 42 permanent personnel assigned to serve PCFD stations full-time. As noted above, CAL FIRE Station No. 100, located 0.82-mile northwest of the project site at 8350 Cook Riolo Road, is the closest fire station to the project site and is jointly operated with the PCFD.

Emergency Vehicle Access

Fire access can be described as the means by which firefighters can enter an area to quickly mitigate a wildfire incident prior to spread to adjacent properties and critical infrastructure at risk. For the purposes of fire apparatus access to the Schellhaus parcel, a proposed 20-foot-wide emergency vehicle access (EVA) road would extend from PFE Road towards the north and connect to the western end of the proposed F Street to allow fire engines to access the project site. In addition, fire engines could access the project site by way of PFE Road and Antelope Road, as well as the newly constructed internal roadways within the Schellhaus and Placer Greens parcels. PFE Road separates the Schellhaus and Placer Greens parcels in an east-to-west direction. Antelope Road is adjacent to the western boundary of the Placer Greens parcel and would be extended from its existing terminus at PFE Road into the Schellhaus parcel.

The existing roads that would serve as the primary evacuation routes during a wildfire event would include PFE Road and Antelope Road in the immediate project vicinity, as well as Cook Riolo Road, Walerga Road, Vineyard Road, and Interstate 80 in the surrounding area.

18.3 REGULATORY CONTEXT

The following sections provide a summary of the federal, State and local regulations pertaining to wildfire that are applicable to the proposed project.

Federal Regulations

The following federal environmental law is relevant to wildfire.

Healthy Forest Reforestation Act

In recognition of widespread declining forest health, the Healthy Forest Restoration Act (HFRA) was passed in 2003 to expedite the development and implementation of hazardous fuel reduction projects on federal land. A key component of the HFRA is the development of Community Wildfire Protection Plans (CWPP) as a mechanism for public input and prioritization of fuel reduction projects. A CWPP provides background information about a project area, discussion of community values at risk, community base maps, a fire risk assessment, and recommendations that identify treatment areas for reducing fuels and promoting education and awareness about wildland fires, as well as monitoring and assessment strategies. The Placer County CWPP⁸ provides a comprehensive analysis of wildfire-related hazards and risks in the WUI zones covered by the Greater Auburn Area, Foresthill/Iowa Hill, Lincoln, and Placer Sierra Fire Safe Councils and includes recommendations to assist stakeholders in preventing and/or reducing the threat of wildfires. According to the Placer County CWPP, and as shown in Figure 18-2, the project site is not located within or in proximity to a WUI zone.

State Regulations

The following are the State environmental laws and policies relevant to wildfire.

⁸ Placer County. *Placer County Community Wildfire Protection Plan*. December 2012.



State Responsibility Area

Pursuant to PRC Sections 4125-4128, the Board of Forestry and Fire Protection classifies all lands in the State for the purposes of determining areas in which the financial responsibility of preventing and suppressing wildfire is primarily the responsibility of the State. The classified lands are termed SRA.

Fire Hazard Severity Zones

FHSZs are geographical areas designated pursuant to California PRC Sections 4201 through 4204 and classified as Very High, High, or Moderate in SRAs or as Local Agency Very High FHSZs designated pursuant to California Government Code Sections 51175 through 51189.

The California Code of Regulations (CCR), Title 14, Section 1280 entitles the maps of the geographical areas as “Maps of the Fire Hazard Severity Zones in the State Responsibility Area of California.”

California Public Resources Code Section 4291

California PRC Section 4291 sets forth minimum fire safety standards for development in or adjoining WUI zones, such as mountainous areas and forest-covered lands. Provisions of California PRC Section 4291 for such development include, but are not necessarily limited to, the following:

- Defensible space must be maintained 100 feet from the side, front and rear of a structure, or up to the property line where the property line is less than 100 feet from the structure;
- Any tree, shrub, or other plant adjacent to or overhanging a building must be free of dead or dying wood;
- The roof of any structure must be free of leaves, needles, or other vegetative materials;
- Prior to constructing a new building, the owner shall obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable State and local building standards; and
- Prior to final inspection approval of any building, the fire department must inspect the building and the fire suppression facilities to certify that the fire suppression improvements comply with the California Building Code and fire department service requirements.

The project site is not in or adjoining a WUI zone; therefore, the minimum fire safety standards set forth by PRC Section 4291 related to development in such areas would not apply to the proposed project.

California Building Code – Chapter 7A (Materials and Construction Methods for Exterior Wildfire Exposure)

Chapter 7A of the California Building Code (CBC) (Title 24 CCR, Part 2) includes definitions and standards for building materials, systems, and/or assemblies to be used for the exterior design and construction of new buildings located within a WUI zone, which is defined by the CBC as a geographical area identified by the State as a “Fire Hazard Severity Zone” in accordance with the PRC Sections 4201 through 4204 and Government Code Sections 51175 through 51189, or other areas designated by the enforcing agency to be at a significant risk from wildfires.

Chapter 7A of the CBC is intended to establish minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within SRAs or any WUI zone to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes



to a systematic reduction in conflagration losses. All new buildings to be located in a FHSZ or WUI zone designated by the enforcing agency for which an application for a building permit is submitted on or after July 1, 2008 are required to comply with Chapter 7A of the CBC. Examples of the Chapter 7A standards include, but are not limited to, use of ignition-resistant materials, fire-intrusion design of roofing and vents, and use of glazed exterior windows and doors.

The project site is not in a WUI zone; therefore, the standards set forth by CBC Chapter 7A related to development in such areas would not apply to the proposed project.

Local Regulations

The following local goals and policies related to wildfire are applicable to the proposed project.

Placer County General Plan

The Placer County Board of Supervisors adopted the 2021 Health and Safety Element Update on November 16, 2021 through Resolution 2021-359. The update includes refinements to the goals, policies, and implementation programs that address potential and existing hazards in the County, including those related to wildfire. The following goals and policies from the Placer County General Plan, including those from the 2021 Health and Safety Element Update, are applicable to the proposed project.

Public Facilities and Services Element

Goal 4.I To protect residents of and visitors to Placer County from injury and loss of life and to protect property and watershed resources from fires.

Policy 4.I.1 The County shall encourage local fire protection agencies in Placer County to maintain the following minimum fire protection standards (expressed as Insurance Service Organization (ISO) ratings):

- a. ISO 4 in urban areas
- b. ISO 6 in suburban areas
- c. ISO 8 in rural areas

Policy 4.I.2 The County shall encourage local fire protection agencies in the County to maintain the following standards (expressed as average response times to emergency calls):

- a. 4 minutes in urban areas
- b. 6 minutes in suburban areas
- c. 10 minutes in rural areas

Policy 4.I.3 The County shall require new development to develop or fund fire protection facilities, personnel, and operations and maintenance that, at a minimum, maintains the above service level standards.

Policy 4.I.4 The County shall work with local fire protection agencies to identify key fire loss problems and design appropriate fire



	safety education program to reduce fire incidents and losses.
Policy 4.I.5	The County shall work with local fire protection agencies and implement ordinances to control fire losses and fire protection costs through continued use of automatic fire detection, control, and suppression systems.
Policy 4.I.7	The County shall maintain and strengthen automatic aid agreements to maximize efficient use of available resources.
Policy 4.I.8	The County shall work with local fire protection agencies to maintain a pre-fire planning program with selected high-risk occupancies reviewed at least annually.
Policy 4.I.9	The County shall ensure that all proposed developments are reviewed for compliance with fire safety standards by responsible local fire agencies per the Uniform Fire Code and other County and local ordinances.
Policy 4.I.10	The County shall work with local fire protection agencies to inventory and eliminate structurally unsafe and fire-hazardous housing units that are beyond repair or rehabilitation.
Policy 4.I.11	The County shall encourage local fire protection agencies to provide and maintain advanced levels of emergency medical services (EMS) to the public.

Health and Safety Element

Goal 8.C.1 To minimize the risk of loss of life, injury, and damage to property and watershed resources resulting from unwanted fires.

Policy 8.C.1.1	The County shall require that new development meet State, County, and local fire district standards for fire protection, including the California Building Standards Code, the International Wildland-Urban Interface Code, and the Placer County Municipal Code as applicable.
Policy 8.C.1.2	The County shall refer applicants of development projects in the unincorporated county to the appropriate local fire agencies for review for compliance with fire safety standards. If dual responsibility exists, then both agencies shall review and comment relative to their area of responsibility. If standards are different or conflicting, the more stringent standards shall be applied. All development in high fire hazard areas shall be designed and constructed to minimize the risk from fire hazards.



- Policy 8.C.1.3 The County shall ensure that existing and new buildings of public assembly incorporate adequate fire protection measures to reduce the potential loss of life and property in accordance with state and local codes and ordinances.
- Policy 8.C.1.4 The County shall encourage and promote installation and maintenance of smoke detectors and fire safety improvements in existing residences and commercial facilities that were constructed prior to the requirement for their installation.
- Policy 8.C.1.6 The County shall continue to implement State fire safety standards through enforcement of the applicable standards contained in the Placer County Land Development Manual.
- Policy 8.C.1.9 For tentative parcel maps and tentative subdivision maps located in a High or Very High Fire Hazard Severity Zone (FHSZ), the County shall require the undergrounding of new electric utilities, except in cases where the undergrounding of such utilities is infeasible or where alternative mitigation is more appropriate or provides the same level of benefit or protection. For all projects located in a Moderate FHSZ, or nonresidential projects in High or Very High FHSZ, the County shall consider all feasible fire preventative measures during environmental review. All projects shall conform to the utility requirements, as specified in applicable Community and Specific Plans, as well as all applicable design standards and guidelines.
- Policy 8.C.1.10 The County shall develop policies and provide updates, as appropriate, that ensure recovery and redevelopment after a large fire reduces future vulnerabilities to fire hazard risks through site preparation, redevelopment layout design, fire-resistant landscape planning, and fire retarding building design and materials.
- Policy 8.C.1.14 The County shall encourage fire protection agencies to continue education programs in schools, service clubs, organized groups, industry, utility companies, government agencies, press, radio, and television to increase public awareness of fire hazards within the county.
- Policy 8.C.1.15 The County shall work with local fire protection agencies, CAL FIRE, and the U.S. Forest Service to maintain existing fuel breaks and emergency access routes for effective fire suppression.
- Policy 8.C.1.16 The County shall work with local fire agencies to develop high-visibility fire prevention programs, including those



offering voluntary home inspections and promoting awareness of home fire prevention measures.

Goal 8.C.2 To manage forests in a sustainable manner that will not endanger urban areas with wildfires.

Policy 8.C.2.1 The County shall continue to work cooperatively with the US Forest Service, CAL FIRE, and local fire protection agencies in managing wildland fire hazards.

Policy 8.C.2.5 The County shall implement the adaptation strategies as contained in the Placer County Sustainability Plan necessary to support forest are managed in a sustainable manner in consultation with federal, state, and local agencies that will not endanger urban areas with wildfires.

Goal 8.E.1 To ensure the maintenance of an Emergency Management Program to effectively prepare for, respond to, recover from, and mitigate the effects of natural, human-made, or technological disasters.

Policy 8.E.1.1 The County shall continue to maintain, periodically update, and test the effectiveness of its Emergency Operations Plan.

Policy 8.E.1.2 The County shall continue to provide promotional programs that inform the general public of emergency preparedness and disaster response procedures.

Policy 8.E.1.3 The County shall maintain an emergency operations center to coordinate emergency response, management, disaster planning, and recovery activities.

Policy 8.E.1.4 The County shall provide alerts about potential, developing, and ongoing emergency situations through extensive alert and warning systems that convey information to all residents, in multiple languages and formats to ensure it is widely accessible.

Policy 8.E.1.6 The County shall continue to coordinate emergency preparedness, response, recovery, and mitigation activities with special districts, service agencies, voluntary organizations, cities within the County, surrounding cities and counties, and state and federal agencies.

Policy 8.E.1.7 The County shall monitor the effectiveness of public safety, preparedness, and hazard mitigation policies under changing climate conditions. The County shall regularly update all appropriate planning documents, including the Public Health and Safety Element and the Local Hazard



Mitigation Plan, to continue to protect the community as local conditions change.

Goal 8.E.3 To ensure that medical and public health systems proactively address human health hazards and inequities in the community.

Policy 8.E.3.1 The County shall establish an evacuation planning program to assist people to evacuate during hazardous events.

Policy 8.E.3.3 The County shall work with local water and wastewater districts to ensure that they have a plan and infrastructure for providing adequate service, treatment ability, and storage capacity as needed during and immediately after an emergency, including a wildfire event.

Dry Creek-West Placer Community Plan

The relevant goals and policies from the DCWPCP related to wildfire are presented below.

Fire Protection

Goal 1 Protect the citizens and visitors of the plan area from loss of life while protecting property and watershed resources from unwanted fires through preplanning, education, fire defense improvements, and fire suppression.

Policy 1 Ensure that all proposed developments are reviewed for fire safety standards by local fire agencies responsible for its protection, including providing adequate water supplies and ingress and egress.

Policy 2 Maintain strict enforcement of the County Zoning Ordinance, Uniform Building Code and the Uniform Fire Code.

Policy 5 For those portions of the plan area that are served by the Dry Creek Fire Protection District and that are to be developed in rural-low density residential, low density residential, medium or high density residential, commercial, professional office or industrial, adopt a four minute maximum response time to as much of the new development as possible.

Policy 6 Adopt a policy that provides for the response of no fewer than three engines with nine personnel and a chief officer to all structure fire calls within ten minutes of the receipt of an alarm. Automatic and mutual aid agreements will be used to supplement district resources when deemed appropriate by the district staff.



Placer County Code

The following applicable codes related to wildfire are from the Placer County Code.

Building Code

Buildings constructed within the project site would be subject to the current building standards found in both the CBC and Chapter 15 of the Placer County Code. The PCFD enforces standards associated with the installation of residential fire sprinkler systems and the installation of Class A roofing materials within all residential units. Both State and local requirements would significantly assist in reducing the threat of a wildfire spreading from undeveloped land to a nearby building.

Fire Code

Placer County has adopted the CFC (Title 24 CCR, Part 9) (Sections 15.04.510 [Fire Code Adopted] and 15.04.520 [Fire Code Amended]). The CFC addresses emergency access, access gates, sprinkler systems, fire alarms within buildings, and construction of access roads to accommodate fire apparatus. The CFC requires that an automatic fire sprinkler and/or fire extinguishing system be installed throughout new one- and two-family dwellings and commercial buildings 3,600 square feet (sf) and larger.

Fire Prevention Code

Chapter 9, Article 9.32, Part 3 of the Placer County Code requires the maintenance of “fire breaks” around structures and the clearing of roofs to prevent structural fires in the WUI. Chapter 9, Article 9.32, Part 4 of the Placer County Code requires that hazardous vegetation be abated on unimproved parcels in the County. Abatement of hazardous fuels is required if the unimproved parcel is adjacent to an improved parcel where implementation of required defensible space would extend onto the unimproved parcel. Abatement is also required along roads if, in the opinion of the County fire warden, the presence of hazardous fuels constitutes a potential obstacle to emergency access.

Subdivision Design Standards and Improvements

In order to better meet the ultimate goals of fire protection, including goals related to the protection of life, community, and valuable property, each subdivider of land in the unincorporated portions of Placer County is required to comply with the minimum requirements set forth in Placer County Code Section 16.08.080 (Fire Suppression). The requirements contained therein are related to water supply for the purposes of fire flow, including provisions related to hydrants, delivery rate, maintenance of the water system, and on-site water storage.

Placer County Office of Emergency Services

Placer County’s OES provides emergency management services in cooperation with local cities and special districts, including fire agencies. During an active incident, such as fire or flood, the OES helps initiate first responses. The functions of the OES include emergency planning, response, recovery, and mitigation, including preparation of a Local Hazard Mitigation Plan (LHMP). The currently adopted Placer County LHMP, which was updated in 2016,⁹ is a joint effort between Placer County and 15 other jurisdictions, and is intended to guide hazard mitigation planning to reduce the effects of hazard events, including wildfires.

⁹ Placer County. *Local Hazard Mitigation Plan Update*. March 2016.



Placer County Local Hazard Mitigation Plan

The 2016 LHMP was prepared pursuant to the requirements of the Disaster Mitigation Act of 2000 so that Placer County would be eligible for the Federal Emergency Management Agency's (FEMA) Pre-Disaster Mitigation and Hazard Mitigation Grant Programs, as well as lower flood insurance premiums. The LHMP is a multi-jurisdictional plan that geographically covers the entire area within Placer County's jurisdictional boundaries. The purpose of the plan is to guide hazard mitigation planning and to better protect the people and property of the County from the effects of hazard events. The LHMP demonstrates the community's commitment to reducing risks from hazards and serves as a tool to help decisionmakers direct mitigation activities and resources.

A draft Placer County 2021 LHMP Update was submitted for review to both CalOES and FEMA at the end of June 2021. On September 3, 2021, FEMA transmitted an Approval Pending Adoption letter which stipulated that the Placer County 2021 LHMP Update met all the regulatory requirements and was eligible for final adoption. The Placer County Board of Supervisors adopted the Placer County 2021 LHMP on November 16, 2021. The goals of the 2021 LHMP are as follows:

- Goal 1: Minimize risk and vulnerability of Placer County to the impacts of natural hazards and protect lives and reduce damages and losses to property, economy, public health and safety, and the environment;
- Goal 2: Provide protection for critical facilities, infrastructure, utilities and services from hazard impacts;
- Goal 3: Improve public awareness, education, communication, and preparedness for all hazards;
- Goal 4: Increase communities' capabilities to mitigate losses and to be prepared for, respond to, and recover from a disaster event;
- Goal 5: Ensure a more resilient County that can adapt to the hazards created or exacerbated by Climate Change;
- Goal 6: Reduce fire severity and mitigate undesirable fire outcomes in Placer County; and
- Goal 7: Maintain FEMA Eligibility/Position the communities for grant funding.

Placer County and Placer Operational Area Emergency Operations Plan

The Placer County and Placer Operational Area Emergency Operations Plan (EOP) provides the guidelines needed for emergency response planning, preparation, training and execution throughout unincorporated Placer County.¹⁰ The EOP is applicable to any natural disaster or manmade emergency occurring in or in the proximity of Placer County that affects, or may affect, the unincorporated area of the County (or the entire operational area, should response require coordination of the emergency response efforts of multiple agencies or jurisdictions). Emergency events range from minor oil spills, brush fires and minor flooding to severe winter storms, floods, wildland fires, and earthquakes to countywide public health emergencies, all of which have potentially catastrophic long-term public safety, economic, social and political implications.

Placer County Community Wildfire Protection Plan

The Placer County CWPP is the result of a communitywide planning effort that included extensive field data gathering, compilation of existing documents and geographic information system (GIS)

¹⁰ Placer County Office of Emergency Services. *Placer County and Placer Operational Area Emergency Operations Plan*. Adopted December 14, 2010.



data, and scientific analyses and recommendations designed to reduce the threat of wildfire-related damages to values at risk. The CWPP provides valuable information related to wildfire to citizens, policymakers, and public agencies throughout western Placer County. The primary goal of the CWPP is to protect human life, private property, essential infrastructure, and natural resources through the implementation of fire prevention projects that work to increase public awareness, improve forest health, sustain local wildlife and preserve the natural beauty of the area through a shared responsibility concept. To that end, the CWPP identified recommendations to aid stakeholders in preventing and/or reducing the threat of wildfire in the County.

Placer County Sustainability Plan

The County adopted the Placer County Sustainability Plan (PCSP) : A Greenhouse Gas Emission Reduction Plan and Adaptation Strategy on January 28, 2020. The primary goal for the adaptation component of the PCSP is to create a resilient Placer County that can adapt to the hazards created or exacerbated by climate change. To accomplish this goal, the PCSP provides several goals, strategies, and actions that promote coordination among agencies, protection of buildings, and implementation of mitigation measures to reduce wildfire activity in the County. The following PCSP strategies and actions are related to wildfire.

Strategy WF-5

Require all new large development projects in Moderate, High, or Very High Fire Hazard Severity Zones to have multiple points of ingress and egress to improve evacuations and emergency response access.

Strategy WF-7

Explore requiring fire-safe improvements before issuing a building permit or other formal approval for significant retrofits to buildings in identified Very High and High Fire Hazard Severity Zones, including installation of sprinklers and fire-safe exterior materials as feasible.

Action 1

Coordinate with the Placer County Fire Safe Alliance and local Fire Safe Councils to encourage new and existing planned developments in the WUI and other areas with elevated wildfire risk to join the Placer County Firewise Communities program.¹¹

18.4 IMPACTS AND MITIGATION MEASURES

The following section describes the standards of significance and methodology used to analyze and determine the proposed project's potential impacts related to wildfire. In addition, a discussion of the project's impacts, as well as mitigation measures where necessary, is also presented.

¹¹ The Placer County Fire Safe Alliance provides community assistance, information, and education programs in an effort to reduce the risks of wildfire danger to life and property in the County, and is comprised of various members, including, but not limited to, Placer County; CAL FIRE; U.S. Bureau of Land Management; U.S. Bureau of Reclamation; and the Greater Auburn Area, Foresthill/Iowa Hill, Lincoln, and Placer Sierra Fire Safe Councils. Through the County's Firewise Communities Program, Placer County is a member community of the NFPA's Firewise USA Program, which is aimed at homeowners and provides specific criteria for communities regarding wildfire preparedness. The program provides resources to help homeowners learn how to adapt to living with wildfire and encourages neighbors to work together to take action to prevent losses.



Standards of Significance

Consistent with Appendix G of the CEQA Guidelines, Section XX, Wildfire, determination of significant impacts related to wildfire is based on whether the proposed project would result in the following, if located in or near SRAs or lands classified as Very High FHSZs:

- Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

It should be noted that, per CEQA Guidelines Appendix G, the standards of significance listed above are only relevant when a project's location is within a SRA or Very High FHSZ. The project site is not located within land designated as either. Rather, the project site is located within a LRA and is identified by CAL FIRE as being within a Non-Very High FHSZ area. Nevertheless, to provide a conservative analysis, this chapter evaluates the potential impacts of the proposed project based on the standards listed above.

Method of Analysis

The impact analysis contained in this chapter is based on a review of available CAL FIRE wildfire hazard mapping and recent wildfire history within Placer County. In addition, State and local fire hazard regulations were evaluated to identify applicable design requirements for the proposed project to minimize wildfire risk (e.g., defensible space).

Project-Specific Impacts and Mitigation Measures

The following discussion of impacts is based on the implementation of the proposed project in comparison with the standards of significance identified above.

18-1 Substantially impair an adopted emergency response plan or emergency evacuation plan. Based on the analysis below, the impact is *less than significant*.

Emergency events, like wildland fires, are unpredictable. The location of the fire, the time of day an event occurs, the direction of travel, and the rate of spread are unknown. Due to such uncertainty, the use of traditional capacity analysis, such as AM and PM peak hour operations at study intersections, is limited for the analysis of emergency events. Furthermore, while Placer County has an adopted LHMP and EOP, which are both intended to provide emergency resources and plans in response to local hazards, such as wildfires, the County does not have an adopted emergency evacuation plan. However, in the event of an emergency, emergency responders do have measures that can be deployed to aid in the movement of the public from danger. For instance, during evacuation events, State and/or local emergency responders provide active traffic control at intersections, close roads, provide detours for through traffic, and actively manage available travel lanes to facilitate evacuation away from the



emergency. Such measures would be initiated in the event that an evacuation is deemed necessary.

For the purposes of this analysis, the existing roads adjacent to the project site, PFE Road and Antelope Road, would serve as the primary evacuation routes during a wildfire event. In addition, Cook Riolo Road, Walerga Road, Vineyard Road, and Interstate 80, all of which are located within approximately two miles from the project site boundary, would also serve to assist in evacuating residents. As discussed above, a proposed 20-foot-wide EVA road would extend from PFE Road towards the north and connect to the western end of the proposed F Street to allow fire engines to access the project site.

The Circulation Plan Diagram in the County's General Plan (Figure 1-8 of the General Plan) depicts the circulation system for the unincorporated portions of the County, with roadways shown by means of a set of roadway classifications. Roadways are classified based on the linkages they provide and their function, both of which reflect their importance to land use patterns, travelers, and the public's general welfare. The County's roadway system classifies roadways into the following hierarchy: local streets, collector roadways, arterial roadways, thoroughfares, and expressways. In general, roadways higher in the hierarchy are meant to collect traffic from roads lower in the order.

As discussed in Chapter 16, Transportation, of this EIR, according to the Transportation Impact Analysis (TIA) prepared for the proposed project by KD Anderson & Associates, Inc., PFE Road is currently a two-lane, east-west rural collector that primarily serves to link the PFE Road/Watt Avenue intersection in the unincorporated County with Atkinson Street in the City of Roseville. Antelope Road is a two-lane, north-south rural collector that connects PFE Road to Sacramento County. As collectors, the roadways primarily serve to collect vehicles from local streets and route them to roads higher in the County's classification hierarchy. The currently narrow roadways could lead to substantial congestion in the event that all residents of the 597 proposed residences evacuated the area at the same time.

However, as detailed in the TIA, in April 1996, the Placer County Board of Supervisors adopted the Countywide Traffic Impact Fee Program, requiring new development within the County to address adverse effects to the roadway system through payment of traffic impact fees. The fees collected through the program, in addition to other funding sources, allow the County to construct roads and other transportation facilities and improvements needed to accommodate new development. The fee was updated by Placer County in August 2021. The County's fee program and Capital Improvement Program (CIP) is divided into 11 districts, and the project site is included in the Dry Creek-West Placer Benefit District. Current roadway improvements planned in the project vicinity are shown in Table 18-1.



Table 18-1 Dry Creek-West Placer CIP Improvements			
Street	Number of Lanes – Facility Classification	Location	Description
Cook Riolo Road	Two Lanes – Rural Collector	PFE Road to Baseline Road	Traffic-calming/safety measures
Antelope Road	Two Lanes – Rural Collector	Sacramento County line to PFE Road	Widen to four lanes
		At PFE Road	Traffic signal
PFE Road	Two Lanes – Rural Collector	Antelope Road to City of Roseville	Widen to four lanes
		Walerga Road to Cook-Riolo Road	Traffic-calming/control
		Watt Avenue to Walerga Road	Construct four lanes
Vineyard Road	Two Lanes – Rural Collector	Crowder Lane to Foothills Blvd	Safety measures
Walerga Road	Two Lanes from County Line to Seabiscuit Drive/Tiller Way – Rural Collector; Four Lanes North of Seabiscuit Drive/Tiller Way – Minor Arterial	Baseline Road to Sacramento County	Widen to six lanes
		At PFE Road	Traffic signal/intersection improvements
Source: KD Anderson & Associates, Inc., 2022.			

Based on the planned CIP improvements shown in Table 18-1, project vicinity roadways, including PFE Road and Antelope Road, are scheduled for improvements that would allow for traffic volumes generated by buildout of the DCWPCP, including the proposed project, to be better accommodated. As part of the proposed project, the PFE Road entries to the project's East and South Villages are proposed at a new four-way signal east of Antelope Road. The PFE Road entry to the project's Central and West Villages is proposed at a signal to be installed at the northern extension of Antelope Road.

In addition to the installation of the two signalized intersections along PFE Road, a number of other off-site and frontage roadway improvements are proposed as part of the project, as follows:

- The westerly segment of PFE Road would include single through lanes in each eastbound and westbound direction with a center two-way left turn lane for neighboring property driveway access and acceleration lane egress.
- The easterly segment of PFE Road would include two through lanes in each eastbound and westbound direction with dedicated left and right turn lanes into the Village 1 and 4 entrances.
- North Antelope Road would include two through lanes in each northbound and southbound direction with dedicated left and right turn lanes into Village 4.
- North Antelope Road/PFE Road Intersection: The eastbound PFE Road approach would include a dedicated left turn into Village 3 and dedicated right turn onto southbound North Antelope Road. The westbound approach would include dual left turn lanes onto North Antelope Road, a single through lane to PFE Road and dedicated right turn into Village 3. The northbound approach



would include a single dedicated left, single shared left/through and dual right turn lanes onto PFE Road. The initial width of the west leg of PFE Road would include two receiving lanes for the northbound left and shared left-thru from North Antelope Road.

- From the East and South Village intersection, PFE Road would transition beyond Viking Place to the existing roadway configuration near the Roseville city limits.
- The proposed project would include improvements to the PFE Road/Cook Riolo Road intersection to install a 65-foot, free right-turn lane onto Cook Riolo Road from westbound PFE Road. The intersection improvements would include the installation of a median to separate the free right-turn lane from the westbound through lane along PFE Road. The final design of all improvements would be subject to approval by the County.

The aforementioned off-site improvements to PFE Road and Antelope Road, in conjunction with the planned CIP improvements listed above, would aid in the event that evacuation of the project site during a wildfire is necessary. Furthermore, during evacuation events, emergency responders would provide active traffic control at intersections, and may close roads, provide detours for through traffic, and/or actively manage available travel lanes to facilitate evacuation away from the emergency. Additionally, as discussed previously, the proposed 20-foot-wide EVA from PFE Road would allow fire engines to access the Schellhous parcel's F Street.

In the event of a wildfire, future residents of the proposed project would be provided sufficient warning through the Placer Alert system, a component of a partnership between public safety agencies in Placer, Sacramento, and Yolo counties to alert residents about emergency events and other important public safety information through a community notification system. The system enables the Placer County Sheriff's Office to provide the public with critical information quickly in a variety of situations, such as severe weather, unexpected road closures, and evacuations of buildings or neighborhoods. All members of the public can sign up for Placer Alert through the Placer County Sheriff's Office website and elect to receive notifications of emergency situations through various means, including text messages and email.

During wildfire events, emergency responders would be able to access the project site to combat fires, which would serve to reduce the hazardous conditions that precipitate the need for evacuation of residents. As part of the proposed project, new internal roadways would be constructed within the Schellhous and Placer Greens parcels, which would connect to PFE Road and/or Antelope Road. The primary internal road, K Street, would provide access to both parcels by way of a looped path and would consist of a 50-foot-wide right-of-way (ROW). From K Street, additional roadways would provide access to the individual residential lots and would feature 40-foot-wide ROWs. Therefore, all internal roadways proposed as part of the project would be at least 40 feet in width, which is substantially wide enough to accommodate emergency vehicles. In addition, as discussed, a proposed 20-foot-wide EVA would allow fire engines to access F Street from PFE Road. Accordingly, the proposed project would provide adequate emergency access to the project site and would not be expected to conflict with any potential evacuation routes.



While the proposed project would include three gated entries from PFE Road and one from Antelope Road, as shown in Figure 3-7 in the Project Description chapter of this EIR, the proposed gated access points would be required to comply with the emergency vehicle access conditions established by Section 15.04.580 of the Placer County Code. Section 15.04.580 requires that emergency vehicles be provided access at gated entries through inclusion of an override switch and an approved emergency radio frequency gate opening device. Therefore, the proposed gated entries would not impair emergency vehicles from accessing the site in an emergency event. Emergency vehicles would be expected to primarily come from Station 100 at 8350 Cook Riolo Road. From the station, emergency vehicles would proceed southward along Cook Riolo Road, where they would then proceed eastward at the Cook Riolo Road/PFE Road intersection. From PFE Road, emergency vehicles would access the project site through the proposed gated entries. Given that Station 100 is 0.82-mile northwest of the project site, emergency vehicles would be anticipated to arrive on-site within a timely manner.

During project construction, temporary lane closures on PFE Road and Antelope Road could be required; however, as required by Mitigation Measure 16-1 in the Transportation chapter of this EIR, any temporary lane closures would be coordinated with County OES, the Placer County Engineering and Surveying Division, and local emergency services providers. Furthermore, complete closure of the roadways is not anticipated.

Based on the above, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and a ***less-than-significant*** impact would occur.

Mitigation Measure(s)

None required.

18-2 Due to factors such as on-site fuel sources, slope, and prevailing winds, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

The project site is located within the DCWPCP area and contains swales and streams associated with Dry Creek and its tributaries and existing vegetation, including undeveloped annual grassland, riparian woodland vegetation, and trees that line the frontages of PFE Road and Antelope Road. The following discussions evaluate the potential impacts associated with the proposed project related to the exacerbation of wildfire risks due to factors such as on-site fuel sources, slope, and prevailing winds.

Wildfire Risks Due to Existing On-Site Fuel Sources

CEQA Guidelines Appendix G indicates that the extent and nature of on-site vegetation, which would serve as fuel for a wildfire, should be evaluated to determine the potential for a project to exacerbate wildfire risk. The project site is predominantly



undeveloped and currently consists of annual grassland, swales and streams associated with Dry Creek and its tributaries, riparian woodland vegetation, and trees. Areas surrounding the site also currently contain grassland and trees. Implementation of the proposed project would include site clearing activities, which would remove on-site vegetation and would create a buffer between the 79.7 acres of the site that would be retained as open space and the proposed residential development. Development of the site with residential uses would reduce the risk of wildland fire to surrounding areas, because site improvements, such as roadways, driveways, and irrigated landscaping, would reduce readily combustible vegetation. Additionally, wildfire risks would not be anticipated to be exacerbated during project operation, as residential uses typically do not involve operation components that would increase the risk of wildfire.

More specifically, the proposed project would reduce on-site fuel sources through the development of a total of 597 single-family lots across the majority of the 186-acre project site, the sum of which would remove the majority of on-site annual grassland. The proposed project would be required to comply with all applicable State and local standards and regulations associated with prevention of wildfire hazards, including Placer County Code Sections 15.04.510 and 15.04.520, which serve to adopt and amend, as applicable, the CFC. The CFC requires that an automatic fire sprinkler and/or fire extinguishing system be installed throughout new one- and two-family dwellings and commercial buildings 3,600 sf and larger. In addition, the project would be subject to the applicable provisions set forth in Placer County Code Section 16.08.080, which contains requirements for subdivisions related to water supply for the purposes of fire flow, including provisions related to hydrants, delivery rate, maintenance of the water system, and on-site water storage. Although the project site is not within a WUI or Very High or High FHSZ, Placer County Code Section 9.32.160 sets forth hazardous vegetation abatement standards for improved parcels with which the proposed project would be required to comply.¹² As part of compliance, the project would be required to maintain a 100-foot defensible space around all proposed structures. Furthermore, the PCFD enforces standards set forth in the CBC associated with the installation of residential fire sprinkler systems and the installation of Class A roofing materials within all residential units. Overall, both State and local requirements would significantly assist in reducing the threat of a wildfire spreading from undeveloped land to the proposed structures, as well as the potential of fire spreading from the site to surrounding areas.

Along the PFE Road and Antelope Road frontages, as well as the Schellhaus parcel's western boundary, the proposed project would consist of landscape buffers, which would introduce new sources of vegetation. The buffers would vary in width and include canopy street trees and/or native screening shrubs (see Figure 4-10 through Figure 4-14 of the Aesthetics chapter of this EIR). However, as set forth in Placer County Code Section 15.75.040, the landscape buffers would include irrigation scheduling in accordance with the County's Water Efficient Landscape Ordinance, which would ensure the proposed vegetation is sufficiently watered to not result in excessively dry fuel sources. In addition, the majority of the landscape buffers along

¹² Woessner, Ryan, Fire Marshal, California Department of Forestry and Fire Protection, Placer County Fire Department. Personal Communication [email] with Nick Pappani, Vice President, Raney Planning & Management, Inc. March 14, 2022.



the project frontages (except in areas immediately adjacent to the on-site tributaries) would include six-foot-tall masonry walls, which, in addition to providing screening along PFE Road and Antelope Road, would further reduce the risk of fire spreading to adjacent areas.

The proposed project would include open grassy areas and recreational amenities along the project site's Dry Creek tributaries and open space corridor. Additionally, approximately 33 acres of the Schellhous parcel, along Dry Creek, is anticipated to be received by the PCCP Reserve System. The remaining open space on the Schellhous parcel, and 14 acres on the Placer Greens parcel, would be preserved as open space within the project site and maintained by the Creekview Ranch Homeowners' Association (HOA). Preservation of such areas as open space would maintain portions of the on-site fuel sources. The portion of the Schellhous parcel that would be received by the PCCP would be subject to a fire management component that would describe site-specific conditions and actions required to reduce existing fuel loads, minimize environmental effects and protect sensitive resources, and enhance and/or restore natural community characteristics in order to reduce the land's susceptibility to wildfire. PCCP fuel treatments would be aimed at preventing or impairing the spread of a fire and reducing fire severity. Several approaches could be used to reduce fuels, with the choice of approach influenced by environmental constraints, costs, and other social and ecological considerations. The PCCP fire management component would ensure that fuel sources within the 33 acres of the Schellhous parcel proposed for the PCCP Reserve System are reduced. However, without appropriate maintenance of the fuel sources in other open grassy areas within the Schellhous parcel, the potential exists for the project to exacerbate the risk of wildfire spreading to adjacent areas.

In addition, during project construction, equipment without appropriate spark arrestors could result in direct flame impingement on combustible materials, such as existing on-site vegetation or building construction supplies. As such, without proper measures to require that construction activities be equipped with CAL FIRE-approved spark arrestors, project construction could result in the ignition of on-site fuel sources.

Overall, development of the proposed project could exacerbate wildfire risks due to on-site vegetation and building construction supplies, thereby exposing residents in the project vicinity to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and a significant impact could occur.

Wildfire Risks Due to Slope

The DCWPCP area does not contain steep or significant slopes, which limits wildfire risks related to topography in the project region, and the predominant wind direction at the project site is from the south throughout the year, as well as from the west during the summer months. Within the project site, the Schellhous parcel's gently rolling terrain generally slopes downhill from south to north towards Dry Creek. The Placer Greens parcel is similarly characterized by gently rolling terrain.

Based on the existing topography of the project site, slope would not affect on-site fire behavior, as compared to the mountainous areas associated with the Sierra Nevada in the County's northeastern region. Therefore, the proposed project would not exacerbate wildfire risks due to slope, and a less-than-significant impact would occur.



Wildfire Risks Due to Prevailing Winds

With respect to prevailing winds at the project site, as previously discussed, winds from the south are most dominant from mid-February through November. In addition, some winds occur from the west during summer months. The predominant direction of prevailing winds suggests that, during the majority of the year, winds could be reasonably assumed to facilitate spread of fire towards the north of the site, where the Dry Creek corridor is located. Additionally, a fire burning to the west of the project site could potentially move towards the project site. However, as discussed above, the majority of on-site fuel sources would be removed as part of development of the proposed project, which would ensure the proposed project does not exacerbate the wildfire risk due to prevailing winds during project operation.

During project construction, equipment without appropriate spark arrestors could result in direct flame impingement on combustible materials. Without proper measures to require that construction activities be equipped with CAL FIRE-approved spark arrestors, project construction could result in the ignition of on-site fuel sources. Depending on the phasing of the proposed project, which is anticipated to occur over two to four phases, a portion of the proposed residences could be completed and inhabited as other areas of the project site are being constructed. As such, in the event that residences are constructed and occupied within the Schellhous parcel as construction is being completed within the Placer Greens parcel, ignition of on-site fuel sources could exacerbate fire risks and, due to prevailing winds, expose project occupants to pollutant concentrations from a wildfire. Thus, a significant impact could occur.

Conclusion

Based on the above, the proposed project could exacerbate wildfire risks, and thereby expose project occupants and residents in the project vicinity to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors. Therefore, a **significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

18-2 *In conjunction with the submittal of and prior to the approval of Improvement Plans, the applicant shall submit a Vegetation Management Plan (VMP) for review and approval by CAL FIRE, PCFD, and Placer County Community Development Resource Agency. The VMP shall identify roles, responsibilities, and financial resources to ensure successful implementation. The VMP shall be implemented by the project developer and maintained in perpetuity by the project's proposed homeowner's association and may include, but not necessarily be limited to, the following:*

- *Management of the Open Spaces During Project Construction or Adjacent Construction:*



- *Prior to construction activities, all Open Space boundaries shall be designated by placing high visibility construction fencing and/or silt fencing. Fencing shall be maintained in good condition until permanent post and cable fencing can be installed; and*
- *Prior to working within Open Space areas adjacent to wetlands, a qualified wetland biologist shall flag the wetland boundary and monitor construction activities to prevent encroachment into the wetland areas.*
- **Open Space Maintenance**
 - *Ongoing Fuel Load Management activities shall focus on areas close to homes or on borders, as approved by the County and include activities to mow annual grasses, remove dead and/or diseased trees, snags, and debris, limb live trees up to a height of 10 feet above ground where feasible, and remove understory fuels over one foot in height, where feasible. The use of goats shall be the preferred method of reducing vegetation materials; alternative methods, such as plastic string weed trimmers or other County-approved equipment may be acceptable, but shall be limited to the maximum extent feasible. Chipping of material shall be permitted. Chipped material shall be removed from the site unless otherwise approved by the County. Prescribed burning shall be prohibited and herbicide use shall not be allowed within the fuel load reduction area; and*
 - *Annual monitoring memos shall be submitted to the County and the Open Space Manager/HOA by June 30 of each year. The memos shall include, at a minimum, the following:*
 - *An assessment of dead vegetative matter (thatch) and management recommendations, if needed; and*
 - *An evaluation of general site conditions and recommendations for remedial fuel reduction actions to be included in the annual monitoring memo and shared with the Open Space Manager/HOA.*

18-3 Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Based on the analysis below, the impact is less than significant.



The proposed project would include installation of various infrastructure components, including roadways, an EVA, connection to fire water sources, power lines, an on-site sewer lift station, and other utilities. Additionally, three alternative locations have been proposed for the on-site lift station and each alternative location would convey wastewater by way of one of three off-site sewer pipeline alignment options (Options 1A, 1B, or 1C) (see Figure 3-8 of the Project Description chapter of this EIR). All potential physical environmental impacts that could result from implementation of the proposed project, including the off-site improvements, have been evaluated throughout the technical chapters of this EIR.

The proposed roadways would not exacerbate fire risks, as the Placer County Code requires a 10-foot vegetation clearance next to roadsides to reduce fire hazards. Additionally, pursuant to County standards and DCWPCP Policy 18, power lines and other utilities constructed for the proposed project would be undergrounded, which would reduce fire risks during operations. Through implementation of Mitigation Measure 18-2, a VMP would be established, requiring various provisions to ensure that regular maintenance of on-site open space areas is conducted, including the removal and reduction of hazardous fuels, which would reduce the potential for fire to occur within the project site and spread to adjacent areas. Furthermore, as discussed above under Impact 18-2, structures constructed as part of the proposed project would comply with all applicable standards set forth by the CBC and CFC, including the use of Class A roofing materials within all residential units and fire-intrusion design of roofing and vents. Therefore, the proposed infrastructure improvements associated with the project would not substantially exacerbate wildfire risk.

The proposed project would also be subject to the applicable provisions set forth in Placer County Code Section 16.08.080, which contains requirements for subdivisions related to water supply for the purposes of fire flow, including provisions related to hydrants, delivery rate, maintenance of the water system, and on-site water storage. As mandated therein through Section 16.08.080(A)(1), the proposed project would be required to provide a pressurized hydrant system throughout the project site, subject to the approval by the Community Development Resource Agency Director. The fire hydrants within the project site would meet all applicable PCFD and CAL FIRE requirements. Long-term maintenance and operation of the emergency water supply infrastructure would not involve any activities that would result in an increase in wildfire risk.

While the long-term maintenance of the proposed roadways, fuel breaks, emergency water supply connections, power lines, and other utilities would not exacerbate fire risks, the activities associated with the initial construction and placement of the utilities and infrastructure could cause a temporary increase in fire risks due to the use of heavy equipment, which would contain combustible materials such as fuels and oils and ignition sources. However, the project contractor would be required to comply with all California Health and Safety Codes and local County ordinances regulating the handling, storage, and transportation of hazardous materials, which would help to minimize the potential for accidental conditions, including fire. Furthermore, as discussed above, the VMP set forth by Mitigation Measure 18-2 requires that equipment used for cutting of on-site vegetation be equipped with CAL FIRE-approved spark arrestors to prevent the escape of carbon or other flammable particles.



Compliance with the VMP would reduce the fire risk posed by vacant parcels or parcels under construction adjacent to structures.

Based upon the above, the proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, the project would result in a ***less-than-significant*** impact.

Mitigation Measure(s)

None required.

18-4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Based on the analysis below, the impact is *less than significant*.

Wildfires alter landscapes and can result in post-event hazards triggered primarily by rainfall. Rainfall that is normally captured and stored by vegetation can run off almost instantly, causing creeks and drainage areas to flood much sooner during a storm and with more water than is expected under unburned conditions. Soils burned at moderate and high severity tend to have reduced infiltration capacity and are more easily eroded. The potential post-fire flooding, soil erosion, and debris flows can impact recreational areas, homes, structures, roads, and other infrastructure within, adjacent to, and downstream from burned areas.

Wildfire-related flooding and increased runoff may continue for several years in a burn area. However, post-fire debris flows do not typically occur beyond the second rainy season. Some of the largest debris-flow events happen during the first post-fire storm season. While multiple factors can affect debris-flow occurrence, post-fire debris flows generally are triggered by one of two processes: surface erosion caused by rainfall runoff; and landsliding caused by rainfall seeping into the ground. Surface erosion runoff processes are by far the most prevalent contributors to debris flows. Landsliding contributes less to fire-related debris flow, but prolonged heavy rains may increase soil moisture even after a wildfire.¹³ The wetted soil can then fail, producing infiltration-triggered landslides. The landslides could be shallow or deep-seated (i.e., greater than 10 to 15 feet deep).

As previously discussed, the project site does not feature steep or significant slopes. As such, the proposed project would not be vulnerable to risks such as post-fire downslope or downstream flooding or landslides. Additionally, while the existing topography of the Schellhous parcel slopes gradually towards Dry Creek, through development of the proposed project, the majority of on-site fuel sources would be removed as part of site improvements, thereby reducing the potential for substantial fire-burned areas to occur on-site. The reduction in on-site areas highly vulnerable to

¹³ U.S. Geological Survey. *Post-Fire Flooding and Debris Flow*. Available at: https://www.usgs.gov/centers/ca-water/science/post-fire-flooding-and-debris-flow?qt-science_center_objects=0#qt-science_center_objects. Accessed March 2022.



wildfires would similarly reduce the potential for post-fire runoff from the developed project site to transport substantial sediment to Dry Creek. Furthermore, given the developed nature of the area south of the project site, the potential for surface erosion caused by rainfall runoff to occur would be limited.

Based on the above, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, a ***less-than-significant*** impact would occur.

Mitigation Measure(s)

None required.

Cumulative Impacts and Mitigation Measures

As defined in Section 15355 of the CEQA Guidelines, “cumulative impacts” refers to two or more individual effects which, when considered together, are considerable, compound, or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

The cumulative setting for impacts related to wildfire encompasses buildout of the DCWPCP. For more details regarding the cumulative setting, refer to Chapter 20, Statutorily Required Sections, of this EIR.

18-5 Increase in wildfire risk attributable to the proposed project, in combination with cumulative development. Based on the analysis below, the cumulative impact is *less than significant*.

The cumulative setting for this EIR encompasses the DCWPCP area. Future development within the DCWPCP would result in changes to the existing land use environment through conversion of vacant land to developed uses that would result in a reduction of existing vegetation. Planned development within the DCWPCP area includes the Brady Vineyard Subdivision Project, currently under construction approximately 0.72-mile to the northeast of the project site, the RVSP, currently under construction approximately 1.7 miles to the west of the project site, and the PVSP, portions of which are currently under construction approximately 2.1 miles to the west of the project site. All three areas are separated from the project site by intervening residential and agricultural uses. Similarly, the Double S Ranch Project, located along Vineyard Road to the northwest of the project site, is bordered by agricultural uses and rural single-family homes to the north, east, and west. Development of other approved projects, as well as the project site, would change the existing landscape of those specific locations from vacant or minimally developed land to more intensively developed residential areas with one- and two-story homes on various sized lots.

The DCWPCP area is not located within a SRA. As shown in Figure 18-1, the entirety of the DCWPCP area is located within a Non-Very High FHSZ. Additionally, all development facilitated by buildout of the DCWPCP would be subject to existing regulations and guidelines designed to prevent wildlife hazards. Similar to the



proposed project, development of other areas within the DCWPCP would be required to comply with Placer County Code Sections 15.04.700 and 15.04.710, which serve to adopt and amend, as applicable, the CFC. In addition, future subdivision projects would be subject to the applicable provisions set forth in Placer County Code Section 16.08.080, which contains requirements for subdivisions related to water supply for the purposes of fire flow, including provisions related to hydrants, delivery rate, maintenance of the water system, and on-site water storage. Furthermore, the PCFD enforces standards set forth in the CBC associated with the installation of residential fire sprinkler systems and the installation of Class A roofing materials within all residential units. As such, all buildings would meet all fire code requirements, as set forth by the CBC and CFC, which could include fire sprinklers and fire alarms, as determined by the County Fire Marshal at building permit stage, depending upon building and occupancy type. Finally, similar to the project site, parcels within the DCWPCP currently include fuel sources such as oak woodland, riparian vegetation, and annual grassland. However, development of said parcels would remove existing fuel sources, thereby reducing the cumulative risk of wildfire hazards. Compliance with State and local standards would minimize wildfire risks at each cumulative project location.

As set forth by Mitigation Measure 18-2, the proposed project would be required to implement a VMP that would include management of on-site open space areas during project construction and ongoing management of open space areas during project operation. The VMP requires, among other things, that during project construction and adjacent construction, open space areas be clearly delineated so that minimal damage occurs to natural habitats, and that during project operation, open space areas restrict public access and ongoing maintenance of such areas is completed, in part, through the grazing by goats or by way of County-approved equipment that uses spark arrestors.

Based on the above, the proposed project with implementation of the VMP required by Mitigation Measure 18-2, in combination with buildout of the DCWPCP area, would have a ***less-than-significant*** cumulative impact related to exacerbating wildfire risk.

Mitigation Measure(s)

None required.

